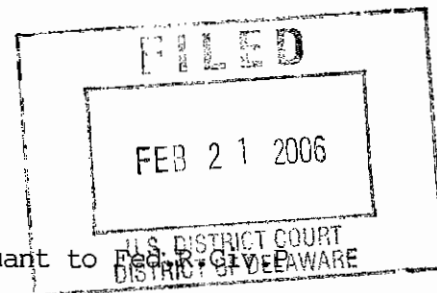


IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al.,)
)
Plaintiffs,)
)
v.) Civ. No. 05-823-KAJ
)
STANLEY TAYLOR, et al.,)
)
Defendants.)



RENEWAL MOTION TO AMEND

The plaintiffs, proceeding pro se, hereby moves pursuant to Fed. R. Civ. P. 15(a) the Honorable Court to amend their complaint to add John F. Davis as an additional plaintiff and respectfully represents:

1. On December 1, 2005 a Complaint was filed pursuant to 42:1983 against Stanley Taylor, Joyce Talley, Tony Figario, Carl Anson, Delaware Department of Corrections- filed by George A. Jackson, Darus Young, Charles Blizzard. There were also an additional 28 named plaintiff included.

2. The 31 named plaintiffs are similiary situated since they all presently work, or have worked in the Main Kitchen Unit at the Sussex Correctional Institution under work conditions they believed are unconstitutional.

3. John F. Davis is an inmate kitchen worker, who is assigned as a baker at the Main Kitchen Unit at Sussex Correctional Institution.

4. John F. Davis named was inadvertetely ommitted from the Original Complaint due to oversight of the current plaintiffs.

5. Since filing of the original complaint, the folowing named plaintiffs have been moved to different locations of the prison as followed: Samuel Jones, Adrain Wright, Howard Parker, Lawrence B. Dickens, Eldon Potts, and Kashawn Weston have all been moved to the Medium Building. Roderick Brown has been moved to the Key Building.

6. John F. Davis and the remainder plaintiffs are still housed in the Merit Building since the original filing of the complaint.

7. Based on the different location of plaintiffs, John F. Davis is unable to obtain the signatures of the plaintiffs listed in paragraph #5 due to prison regulations that forbids any communication with inmates in other buildings that is not authorized. Unauthorized Communication 2.14 (Rules of Conduct) Therefore, inmate Davis cannot obtain the necessary signatures without the Court's assistance.

8. Therefore, John F. Davis and the signed plaintiffs asked that the Court assist the plaintiffs in this matter, and allow John F. Davis to be added to the original complaint.

DATED:

1/31/06

John Davis

George A. Jackson

Darius Young

Frank Williams

Carl Walker

Kenneth J. Mally

John Jones

Kevin Brown

William Surrage

Joseph White

Joe Seeps

Darwin Sarge

Hilbert Williams

Anthony Morris

Jerry Weston

Heuron M. L. D.

Don & Sanders

Charles F. Blizard

Roy Williams

Ridue Reynolds

Charles Quillen

Roger Thomas

I/M. George Jackson merit
SUSSEX CORRECTIONAL INSTITUTION
P.O. BOX 500
GEORGETOWN, DELAWARE 19947

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